

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 17631, 17643 & 28905

**SUPPLEMENTAL CERTIFICATION OF COUNSEL
REGARDING DEBTORS' FORTY-FIFTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On June 14, 2024, the above captioned debtors and debtors-in-possession (the "Debtors") filed the *Debtors' Forty-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 17631, redacted & 17643, sealed] (the "Objection").

2. On December 19, 2024, the Debtors filed a revised proposed form of order (the "Revised Order") for the Objection under Certification of Counsel [D.I. 28905] reflecting certain agreements, revisions, or adjournments with respect to parties' claims.

3. The FTX Recovery Trust resolved Jean Tripier's formal response to the Objection

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

[D.I. 19970] (the “Tripier Response”) and the informal response from the holder of claim number 88217 without modification to the schedule attached to the proposed form of order.

4. Further, based on ongoing review, the FTX Recovery Trust is withdrawing the Objection solely with regard to claim numbers 1847, 9309, 48781 and 62755 without prejudice and reserves all rights and objections with respect thereto.

5. Accordingly, the FTX Recovery Trust has further revised the Revised Order (the “Further Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawals. A copy of the Further Revised Order compared against the Revised Order attached to the Certification of Counsel is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Further Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Further Revised Order at its earliest convenience.

Dated: April 8, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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EXHIBIT A

EXHIBIT B